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**VIA ECF**

Hon. Arun Subramanian  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St. Courtroom 15A  
New York, NY 10007-1312

**Re: *Flynn et al, v. Cable News Network, Inc.*, No. 1:21-cv-02587-AS-SLC – Letter-Motion to File Confidential and Highly Confidential Materials Under Seal**

Dear Judge Subramanian:


We represent Defendant Cable News Network, Inc. (“CNN”) in the above-referenced action.

Pursuant to the Federal Rules of Civil Procedure 5.2(e) and 26(c), and Your Honor’s Individual Practice Rule 11B, we respectfully request to file the redacted portions of CNN’s concurrently-filed Reply Memorandum of Law in Further Support of its Motion for Summary Judgment and CNN’s Reply to Plaintiffs’ Rule 56.1 Statement under seal given that these documents cite to the same exhibits and deposition testimony that Plaintiffs designated as “Confidential” or “Highly Confidential” pursuant to the March 15, 2022 Confidentiality Stipulation and Protective Order (ECF Doc. No. 60) in this action.

Such relief was previously granted as to CNN’s opening summary judgment filings at ECF Doc. No. 190. Thank you for your consideration.

Respectfully Submitted,

Davis Wright Tremaine LLP

  
Katherine M. Bolger